

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

PLAINTIFFS’ MOTION FOR LEAVE TO FILE UNDER SEAL

Pursuant to Local Civil Rule 5(C) and the Modified Protective Order (Dkt. 203), Plaintiffs respectfully move this Court to seal (1) Exhibits 1-6 to Plaintiffs’ Opposition to Google’s Motion *In Limine* to Exclude Evidence of Google’s Analysis of Remedy Feasibility and the portions of that Opposition that disclose the contents of Exhibits 1-6, and (2) Exhibits 1, 4, 5, 7, 8, 9, and 10 and portions of Exhibits 2, 3, and 6 to Plaintiffs’ Opposition to Google’s Motion to Exclude the Testimony of Dr. Goranka Bjedov and the portions of that Opposition that disclose the contents of Exhibits 1, 4, 5, 7, 8, 9, and 10 or sealed portions of Exhibits 2, 3 and 6. The exhibits and portions of briefs that Plaintiffs seek to seal contain material Defendant Google has designated as confidential or highly confidential or material that non-party Meta has requested to be sealed. Consistent with the local rule and this Court’s Standing Order of July 29, 2025 (In re: Procedures for the Filing of Sealed Documents) and Second Amended Standing Order of April 14, 2021 (In re: Procedures for the Filing, Service, and Management of Highly Sensitive Documents), undersigned counsel will deliver to the Clerk’s office as soon as practicable the materials at issue and hereby certify that they will serve a copy on opposing counsel and deliver a copy to this Court in a separate container labeled “UNDER SEAL.” The

grounds for this motion are contained in the accompanying memorandum of law. A proposed order is attached for the Court's convenience.

Dated: September 5, 2025

Respectfully submitted,

ERIK S. SIEBERT
United States Attorney

JASON S. MIYARES
Attorney General of Virginia

/s/ Gerard Mene
GERARD MENE
Assistant U.S. Attorney
2100 Jamieson Avenue
Alexandria, VA 22314
Telephone: (703) 299-3777
Facsimile: (703) 299-3983
Email: Gerard.Mene@usdoj.gov

/s/ Tyler T. Henry
TYLER T. HENRY
Assistant Attorney General

Office of the Attorney General of Virginia
202 North Ninth Street
Richmond, VA 23219
Telephone: (804) 692-0485
Facsimile: (804) 786-0122
Email: thenry@oag.state.va.us

/s/ Julia Tarver Wood
JULIA TARVER WOOD
DAVID A. GEIGER
MATTHEW R. HUPPERT
DAVID TESLICKO
MICHAEL E. WOLIN

*Attorneys for the Commonwealth of
Virginia and local counsel for the
States of Arizona, California,
Colorado, Connecticut, Illinois,
Michigan, Minnesota, Nebraska, New
Hampshire, New Jersey, New York,
North Carolina, Rhode Island,
Tennessee, Washington, and West
Virginia*

United States Department of Justice
Antitrust Division
450 Fifth Street NW, Suite 7100
Washington, DC 20530
Telephone: (202) 307-0077
Fax: (202) 616-8544
Email: Julia.Tarver.Wood@usdoj.gov

Attorneys for the United States